

04/12/2015

Ms. Nancy Rumrill

U.S. Environmental Protection Agency, Region 9

Drinking Water Protection Section, Mail Code WTR-3-2

75 Hawthorne Street

San Francisco, CA 94105

RE: Draft Class III Underground Injection Control Area Permit

Permit Number R9UIC-AZ3-FY11-1

Areas of Concern:

- * The 1997-1998 BHP pilot test data ignored. The EPA did not request or review it.
- * The permit doesn't provide for enough meaningful monitoring.
- * There are inadequate protections for the lower basin fill unit (LBFU), which is the regional drinking water supply.
- * The upper basin fill unit (UBFU) is incorrectly viewed as the drinking water source.
- * The permit would allow contaminants to be discharged into the LBFU.
- * The permit relies improperly on Florence Copper's assumptions, models and calculations.
- * The EPA doesn't consider surrounding uses and significant developments that have occurred in the area over the last 17 years since the original permit was issued to BPH.

Sincerely,

Susan F. Halcomb

FOIA Exemption 6

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